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## THE KUNIN LAW OFFICES, LLC ATTORNEYS AT LAW

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October 6, 2005

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EPA Region 6 Records Ctr.

Tom Turner,
Associate Regional Counsei
U. S. EPA – Region V
Office of Regional Counsel (C-14J)
77 West Jackson Boulevard
Chicago, IL 60604

Re: Clayton Chemical Site General Notice of Potential Liability

Dear Mr. Turner:

We have been requested by St. Louis Paint Manufacturing Company ("St. Louis Paint") to respond to your letter of September 27, 2005.

Initially, St. Louis Paint denies that it has a liability or is it a responsible party at the Site.

For your further information, St. Louis Paint has been out of business since February 2003 when its personal property assets were seized by its secured creditors and sold at a foreclosure sale. In March 2004, Meramec Valley Bank of St. Louis Missouri foreclosed on St. Louis Paint's real property. At the present time, it has no assets and has numerous uncollectible judgments filed against it.

If you have any further questions, please do not hesitate to inquire of the undersigned.

Very truly yours,

Jucy A. Kulyili

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